



May 7, 2010

Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Rita D. Cohen
Senior Vice President
Legislative & Regulatory Policy

Re: GN Docket No. 10-25

Chairman Genachowski and Members of the Commission:

On behalf of the Magazine Publishers of America (MPA), the premier trade association of the consumer magazine industry, we are pleased to submit comments in response to the Federal Communication Commission's (FCC) ongoing investigation into the future of media. Established in 1919, the MPA represents approximately 225 domestic publishing companies with more than 1,000 titles, nearly 50 international companies and more than 100 associate members. MPA member publications cover a wide span of journalism, reflecting consumers' desire for news and information across many genres, from world and national news, opinion, and public policy to finance, entertainment, fashion, literature, home, and sports.

While the comments appended to this letter were originally submitted in response to a similar ongoing review being conducted by the Federal Trade Commission (FTC), many of the themes and issues included are applicable to the FCC's investigation. From the economics of journalism to the changes in business models, and the evolution of competition to potential government policies in support of journalism, these comments should help provide a robust picture of our industry, its challenges, strengths, and thoughts on the future.

One question the Commission's notice asks specific to the magazine industry is that of trends in staffing and coverage at print magazines. Data from the Bureau of Labor Statistics shows a mixed experience since 2001. From a high of 164 thousand jobs in 2001, the bursting of the high tech bubble and resulting advertising revenue declines led to job reductions of roughly 5% a year from 2002 to 2004. As advertising recovered, total jobs grew from 2005 to 2007, regaining about 2% of total employment. The

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recession that began in the Fall of 2008, however, has led to significant job losses, with nearly 15 thousand jobs (10%) cut through three quarters of 2009. Overall, nearly 40,000 jobs in the publishing industry (23%) have been lost since 2001. In terms of types of magazine content particularly affected, as explained in our attached comments, the news and financial information categories have been hit the hardest by losses in print advertising revenues. There have been a lot of changes, from Business Week being acquired by Bloomberg, to the shuttering of Portfolio in 2009, to US News and World Report changing its print frequency, to the recent announcement of the Washington Post Company's intention to sell Newsweek Magazine.

We are appreciative that the FCC is taking the time to investigate this matter – we agree wholeheartedly that ensuring that “all Americans have access to vibrant, diverse sources of news and information that will enable them to enrich their lives, their communities and our democracy” is an important goal. We believe magazines play a very valuable role in this process by entertaining, informing, and engaging readers. Since these comments were written, there have been some exciting and innovative advances in our industry. From almost 300 new “apps” after the announcement of the iPad to pay walls for online content that look like exciting opportunities for the future. This is a period of experimentation and exploration with more changes coming. We thank the Commission for its time and effort, and look forward to working with the Commission on this matter in the future.

Sincerely,



Rita Cohen

Senior Vice President Legislative and Regulatory Policy